IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Megan Thomas,) Civil Action No.
)
Plaintiff,)
)
VS.) NOTICE OF REMOVAL
) Removed from Circuit Court of Richland
City of Columbia,) County, SC (2017-CP-40-05530)
)
Defendant.)

Defendant City of Columbia, by filing this Notice of Removal and related papers, removes this action from the Circuit Court of Richland County, South Carolina, to the United States District Court for the District of South Carolina, Columbia Division, pursuant to 28 U.S.C. § 1441(a) and (c) and 28 U.S.C. § 1443. In support of removal, the Defendant states:

- 1. On September 13, 2017, Plaintiff filed a lawsuit against the above-named Defendant in the Circuit Court of Richland County. Defendant received service of the Complaint on September 21, 2017. A copy of the Complaint filed in the state court and served on Defendant is attached as Exhibit A.
- 2. The first cause of action presented in the Complaint purports to assert a claim for sexual discrimination under Title VII. (Complaint ¶¶ 5-15).
- 3. The second cause of action presented in the Complaint purports to assert for retaliation under Title VII (Complaint ¶¶ 16-19)
 - 4. This Notice is presented in a timely manner pursuant to 28 U.S.C. § 1446(b).

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5. The Circuit Court of Richland County is located within the District of South

Carolina. Accordingly, removal to this Court satisfies the venue requirements of 28 U.S.C. §

1446(a).

6. Plaintiff, Megan Thomas is a citizen of the State of South Carolina and a resident

of Kershaw County, South Carolina. (Complaint ¶ 1; Exhibit A)

7. Defendant, City of Columbia is a municipality located in Richland and Lexington

Counties, South Carolina.

8. This Court has original subject matter jurisdiction over this action as to the

Defendant, pursuant to 28 U.S.C. § 1441(a) and 28 U.S.C. § 1443(2) insofar as Plaintiff alleges

violations of federal law.

9. A copy of the written notice required by 28 U.S.C. § 1446(d) is attached as

Exhibit B and is being filed in the Circuit Court for Richland County, South Carolina and served

on the Plaintiff.

NICKLES LAW FIRM, LLC

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Attorney for Defendant

Columbia, South Carolina October 5, 2017

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